

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN (Detroit)**

In re:  
Mary A. Krutsch

Debtor.

Chapter 13 No. 18-55881-pjs

Hon. Phillip J. Shefferly

**OBJECTIONS TO CONFIRMATION**

NOW COMES Deutsche Bank National Trust Company, as Trustee for Ameriquest Mortgage Securities Inc., Asset-Backed Pass-Through Certificates, Series 2004-R11, by and through its attorneys, Trott Law, P.C., and hereby Objects to Confirmation as follows:

1. That Creditor is a holder of a mortgage on real property owned by the debtor(s) and located at 1702 W Washington Ave, Jackson, MI 49203-1439;
2. That the mortgage is in material default pursuant to the Creditor's records.
3. That the Debtor's Plan of Reorganization proposes to pay Creditor a regular monthly payment of \$530.00 and a pre-petition arrearage of \$10,000.00 at the rate of \$217.39 per month over 46 months;
4. That according to Creditor's records, Creditor must receive the regular monthly payment of \$485.60 plus a pre-petition arrearage of approximately \$15,560.68 at the rate of at least \$432.24 per month in order for the arrearage to be cured within a reasonable length of time, 36 months;
5. That the Debtor's proposed Plan of Reorganization understates the pre-petition arrearage and the monthly payment on the pre-petition arrearage;
6. That the Debtor's Plan of Reorganization proposes an unreasonable length of time to cure the pre-petition arrearage, 46 months;
7. That the debtor's proposed Plan of Reorganization is underfunded;

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WHEREFORE, Creditor prays that Confirmation be denied.

Respectfully Submitted,  
Trott Law, P.C.

Dated: December 28, 2018

*Rose Merithew*

/S/ Rose Merithew (P73319)

Attorney for Deutsche Bank National  
Trust Company, as Trustee for  
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